

REMARKS

Reconsideration and allowance of the subject application are respectfully requested. By this Amendment, Applicant has canceled claims 3, 5, 7 and 10. Thus, claims 1, 2, 4, 6, 8, 9 and 11-25 are now pending in the application. In response to the Office Action, Applicant respectfully submits that the pending claims define patentable subject matter.

As a preliminary matter, Applicant thanks the Examiner for indicating that claims 10 and 16-24 contain allowable subject matter.

Claims 1, 8, 9, 11, 12 and 25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Admitted Prior Art in view of newly cited Thompson et al. (U.S. Patent No. 5,463,772; hereafter "Thompson"). Claims 2, 3 and 13 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Admitted Prior Art in view of Thompson and Jigour et al. (U.S. Patent No. 5,81,426; hereafter "Jigour"). Claims 14 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Admitted Prior Art in view of Thompson and Intel: Understanding the Flash Translation (FTL) Specification (December 1998, hereafter "the Intel article").

By this Amendment, Applicant has amended claim 1, in a manner similar to allowable claims 16-18, to recite:

the media device is logically connected to the file system according to a predetermined protocol between one of (a) the control and error correction layer of the media driver and a control and error correction layer of the file system such that data is transmitted from the control and error correction layer of the media driver of the slave device to the application program of the host device via the control and error correction layer of the file system of the host device, (b) the logical-to-physical conversion layer of the media driver and a logical-to-physical conversion layer of the file system of the host device such that data is transmitted from the control and error correction layer and the logical-to-physical conversion layer of the media driver of the slave device to the application program via the logical-to-physical conversion layer and file system drive layer of the file system of

the host device, and (c) the file system drive layer of the media driver and a file system drive layer of the file system of the host device such that data transmitted via the control and error correction layer, the logical-to-physical conversion layer and the file system drive layer of the media driver of the slave device is sent to the application program via the file system drive layer of the file system of the host device.

Applicant respectfully submits that neither the Admitted Prior Art nor Thompson teaches or suggests this manner of connection between the media driver of the slave device and the file system of the host.

By this Amendment, Applicant has claim 11 to require “accessing the storage device of the slave device by the host device via the file system of the host device, the top layer of the media driver of the slave device and a bottom layer of the media driver of the slave system.”

Neither the Admitted Prior Art nor Thompson disclose that the media drive has a top layer and a bottom layer, and that the storage device is accessed via the top and bottom layers of the media driver. Although the Examiner cites Thompson for disclosing these features via a hierarchical file system (i.e., root directory and sub-directories), the directories are not part of the media driver.

Lastly, Applicant has amended claim 8 to incorporate the subject matter of allowable claim 10, and rewritten allowable claims 16-24 in independent form.


In view of the above, Applicant respectfully submits that independent claims 1, 8, 11 and 16-24, as well as dependent claims 2, 4, 6, 9 and 12-15, should be allowable.

Reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Patent Application No. 09/597,702

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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